

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER & BENVENUTTI LLP

Tobias S. Keller (#151445)
(tkeller@kellerbenvenutti.com)
Jane Kim (#298192)
(jkim@kellerbenvenutti.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case) (Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND OFFICIAL COMMITTEE OF TORT
CLAIMANTS EXTENDING TIME TO
RESPOND TO CEO COMPENSATION
MOTION**

Re: Dkt. Nos. 2662

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the Official Committee
4 of Tort Claimants (the “**Tort Claimants Committee**”), on the other. The Debtors and the Tort
5 Claimants Committee are referred to in this Stipulation and Agreement for Order collectively as
6 the “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On June 19, 2019, the Debtors filed the *Motion of Debtors Pursuant to 11 U.S.C.*
9 *§§ 363 and 105(a) for an Order Approving Terms of Employment for New Chief Executive*
10 *Officer and President of PG&E Corporation* [Dkt. No. 2662] (the “**CEO Compensation**
11 **Motion**”) which is set for a hearing before the Court at 9:30 a.m. on July 24, 2019. Any
12 response or opposition to the CEO Compensation Motion is due by 4:00 p.m. (Pacific Time) on
13 July 17, 2019.

14 B. Counsel for the Tort Claimants Committee has requested, and counsel for the
15 Debtors has agreed, that the time for the Tort Claimants Committee to respond to the CEO
16 Compensation Motion be extended.

17 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
18 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
19 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
20 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
21 **THAT:**

22 1. The time for the Tort Claimants Committee to file and serve any response
23 or opposition to the CEO Compensation Motion is extended through 9:00 a.m. (Pacific Time) on
24 July 19, 2019.

25 *[Signatures on next page]*
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Dated: July 17, 2019

KELLER & BENVENUTTI LLP

/s/ Thomas B. Rupp

Thomas B. Rupp

*Attorneys for Debtors
and Debtors in Possession*

Dated: July 17, 2019

BAKER & HOSTETLER LLP

/s/ Cecily A. Dumas

Cecily A. Dumas

*Attorneys for Official Committee of Tort
Claimants*